

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re:)	Case No:	16-09415
Rosemary Blake)		
Debtor)	Chapter:	Chapter 13
)		
)	Judge:	Timothy A. Barnes

NOTICE OF MOTION

To: Rosemary Blake, 118 Birch St. #B7, Park Forest, IL, 60466

Marilyn O. Marshall, 224 S. Michigan Ave. #800, Chicago, IL, 60604

Office of the US Trustee, 219 S. Dearborn, Suite 873, Chicago, IL 60604

SEE ATTACHED SERVICE LIST OF ALL CREDITORS

PLEASE TAKE NOTICE that on **March 21, 2019 at 9:30 a.m.** I shall appear before the Honorable Judge **Timothy A. Barnes** at 219 S. Dearborn, Courtroom 744, Chicago IL 60604 and then and there present the attached **MOTION TO MODIFY CONFIRMED PLAN**, a copy of which is attached hereto.

By: /s/ Dale Riley
Dale Riley

CERTIFICATE OF SERVICE

I, Dale Riley, hereby certify that I served a copy of this Notice along with the aforementioned document upon the above parties, by causing the same to be mailed in a properly addressed envelope, postage prepaid, for 55 E. Monroe, Suite 3400, Chicago, Illinois, on 2/26/2019.

By: /s/Dale Riley
Dale Riley

Attorneys for the Debtor

Geraci Law L.L.C.
55 E. Monroe Street #3400
Chicago, Illinois 60603
(Ph): 312.332.1800 (Fax): 877.247.1960

AFNI
Bankruptcy Department
PO Box 3097
Bloomington IL 61702

Merchants Credit Guide
Attn: Bankruptcy Dept.
223 W Jackson Blvd Ste 4
Chicago IL 60606

Radiology Imaging Consultants
Bankruptcy Department
PO Box 1886
Harvey IL 60426

American Financial CRE
Attn: Bankruptcy Dept.
10333 N Meridian St Ste
Indianapolis IN 46290

MiraMed Revenue Group
Bankruptcy Department
Dept. 77304, PO Box 77000
Detroit MI 48277

Regional Recovery SERV
Attn: Bankruptcy Dept.
5252 S Homan Ave
Hammond IN 46320

Blue Cross Blue Sheild
Attn: Mia Jacob
300 East Randolph
Chicago IL 60601

Nissan-Infiniti LT
Attn: Bankruptcy Dept.
2901 Kinwest Pkwy
Irving TX 75063

Specialty Physicians

38132 Eagle Way
Chicago IL 60678

Capital ONE BANK USA N
Attn: Bankruptcy Dept.
15000 Capital One Dr
Richmond VA 23238

Northwest Collectors
Attn: Bankruptcy Dept.
3601 Algonquin Rd Ste 23
Rolling Meadows IL 60008

St. Elizabeth's Hospital
Attn: Bankruptcy Department
1431 N. Claremont Ave.
Chicago IL 60622

Commonwealth Financial
Attn: Bankruptcy Dept.
245 Main St
Dickson City PA 18519

Overland Bond & Investment
Bankruptcy Department
4701 W. Fullerton Ave.
Chicago IL 60639

St. James Health Center
Bankruptcy Department
37653 Eagle Way
Chicago IL 60678

EOS CCA
Bankruptcy Department
PO Box 806
Norwell MA 02061

Pendrick Capital partners II LLC

Po Box 1022
Wixom MI 48393

Clerk, First Mun Div
Bankruptcy Dept.
50 W. Washington St., Rm. 1001
Chicago IL 60602

Equifax
Attn: Bankruptcy Dept.
PO Box 740241
Atlanta GA 30374

Personal Finance CO
Attn: Bankruptcy Dept.
17507 South Kedzie
Hazel Crest IL 60429

Ronald J Hennings
Bankruptcy Department
PO Box 4106
Saint Charles IL 60174

Experian
Attn: Bankruptcy Dept.
PO Box 2002
Allen TX 75013

Phoenix Financial SERV
Attn: Bankruptcy Dept.
8902 Otis Ave Ste 103A
Indianapolis IN 46216

State Collection Servi
Attn: Bankruptcy Dept.
2509 S Stoughton Rd
Madison WI 53716

Franciscan Alliance
Bankruptcy Dept
28044 Network Place
Chicago IL 60673

Phoenix Financial Services

Po Box 361450
Indianapolis IN 46236

Syncb/CARE CREDIT
Attn: Bankruptcy Dept.
950 Forrer Blvd
Kettering OH 45420

Ingalls Memorial Hospital
Bankruptcy Dept
10024 Skokie Blvd
Skokie IL 60077

Primary Healthcare Assoc.
Attn: Bankruptcy Department
4647 W. Lincoln Hwy.
Matteson IL 60443

Syncb/JCP
Attn: Bankruptcy Dept.
Po Box 965007
Orlando FL 32896

MBB
Attn: Bankruptcy Dept.
1460 Renaissance Dr
Park Ridge IL 60068

Professional clinical laboratories, LLC

555 W. Court St., STE 300
Kankakee IL 60901

Transunion
Attn: Bankruptcy Dept.
PO Box 1000
Chester PA 19022

Medical Recovery Specialists
Bankruptcy Department
2250 E. Devon Ave., Ste. 352
Des Plaines IL 60018

Pulmonary and Sleep Associates Inc.

PO Box 688
Mokena IL 60448

United Revenue CORP
Attn: Bankruptcy Dept.
204 Billings St Ste 120
Arlington TX 76010

Village OF PARK Forest-Finance
C/O EOS CCA
Po Box 981025
Boston MA 02298

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

In Re: Rosemary Blake Debtor)))))	Case No: 16-09415 Chapter: Chapter 13 Judge: Timothy A. Barnes
---	-----------------------	---

MOTION TO MODIFY CONFIRMED PLAN

NOW COMES the Debtor, Ms. Rosemary Blake (the “Debtor”), by and through her attorneys, Geraci Law L.L.C., to present her **MOTION TO MODIFY CONFIRMED PLAN**, and states as follows:

1. This Court has jurisdiction over this proceeding pursuant to 28 U.S.C. 1334 and this is a “core proceeding” under 28 U.S.C. 157(b)(2).
2. The Debtor filed her Petition for Relief and plan under Chapter 13 of the U.S. Bankruptcy Act on 03/18/2016.
3. The Debtor’s plan was confirmed by the Court on 05/12/2016, including a provision requiring the Debtor to turn her federal tax refunds over to the Trustee as additional payments into the plan.
4. The Trustee has since adopted a policy of permitting Debtors to keep \$1,200 of each year’s tax refund to help with household expenses.
5. For the reasons stated above, it is necessary for the successful completion of the Debtor’s plan to permit the Debtor to keep \$1,200 of each year’s tax refund beginning with her 2018 refund.

Court enter an order:

1. Permitting the Debtor to keep \$1,200 of each year's tax refund beginning with her 2018 refund,
2. Any other relief the court deems proper.

By: /s/ Dale Riley
Dale Riley

Attorneys for the Debtor

Geraci Law L.L.C.

55 E. Monroe Street #3400

Chicago, Illinois 60603

(Ph): 312.332.1800 (Fax): 877.247.1960